

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**MTGLQ INVESTORS, L.P.,**

**Plaintiff,**

**v.**

**JERRY K. WALDEN, Jr. a/k/a  
JERRY K. WALDEN and  
TAMATHA WALDEN,**

**Defendants.**

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**Civil Action No. 1:19-cv-00992-RP**

**DECLARATION OF MARK D. CRONENWETT**

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the following statements are true and correct:

1. “My name is Mark D. Cronenwett. I am over the age of 21 years and am fully competent to make this Declaration. All statements of fact made herein are true, correct, and within my personal knowledge.

2. I am an attorney for Plaintiff MTGLQ Investors, L.P. (“Plaintiff”).

3. Plaintiff filed its *Original Complaint* (“Complaint”) in this action on October 11, 2019. (ECF Doc. No. 1.)

4. I am an attorney licensed to practice in the State of Texas and am a member of the bar of the United States District Court for the Western District of Texas. I am currently managing attorney for the litigation department of the law firm of Mackie Wolf Zientz & Mann, P.C. (MWZM), with offices located in Dallas, Texas and Houston, Texas. I am in good standing with respect to the State Bar of Texas. A true and correct copy of my resume is attached hereto as **Exhibit A-1**.

5. MWZM was retained by Plaintiff to file this lawsuit to enforce Plaintiff's interest in certain real property as a result of a default under a home equity loan. The legal professionals of MWZM with whom I worked in providing these services are at all relevant times attorneys licensed by the State of Texas, in good standing and experienced in the areas of business, real estate, and commercial litigation practice. Without waiving the attorney-client privilege, the subject matter of the counsel and representation provided to Plaintiff by MWZM legal professionals included, but was not limited to: review and analysis of the loan documents at issue; review and analysis of the history of this matter; preparation and filing of the original complaint; completing service; drafting motions for summary judgment; conducting legal research; drafting responses to defendants' motions; multiple conferences with Plaintiff's mortgage servicer regarding all of these items and this matter generally. These activities are set forth in chronological order by name and date on the invoices included with the motion as **Exhibit A-2**. The hours set forth for each activity were actually expended on the topics stated.

6. The reasonable incurred attorneys' fees are \$19,993.61 in filing and prosecuting Plaintiff's claims to enforce its interest in certain real property as a result of the default of under the home equity loan agreement between the parties. The hourly rate charged is \$215.00 per hour for attorneys and \$85.00 per hour for paralegals and legal assistants.

7. I have become familiar with the legal services necessary to handle claims based on and the reasonable charges for such legal services in the United States District Court for the Western District of Texas and within the State of Texas.

8. In considering reasonable attorneys' fees in this case, I have considered the time and labor involved; the difficulty of the issues presented; the experience, reputation, and ability

of the attorneys involved in pursuing the claims; the skills requisite to properly conduct the case; customary charges of the Bar and awards in similar cases; and the amount in controversy.

9. Based upon my knowledge and experience with similar litigation in the state and federal courts in Texas over the last ten years, and applying the facts and factors set out above, it is my opinion that the hourly rate of up to \$215.00 per hour for attorneys and \$85.00 per hour for paralegals and legal assistants are reasonable and customary, and the sum of \$19,993.61 is reasonable attorneys' fees for prosecuting Plaintiff's claims for the enforcement of its interest in certain real property as a result of a default of under the loan agreement.

10. If any party files post-judgment motion, a reasonable fee for Plaintiff would be \$2,500.00. If this case is appealed to the court of appeals, a reasonable fee for the Plaintiff would be an additional \$5,000.00. If this case is appealed to the United States Supreme Court, a reasonable fee for the Plaintiff would be an additional \$2,500.00."

FURTHER DECLARANT SAYETH NAUGHT.

Signed this October 28, 2020

A handwritten signature in black ink, appearing to read 'M. D. Cronenwett', with a stylized flourish at the end.

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**MARK D. CRONENWETT**

# **EXHIBIT A-1**

## MARK D. CRONENWETT

14160 N. Dallas Parkway, Suite 900 • Dallas, Texas 75254 • (214) 635-2650

### PROFESSIONAL EXPERIENCE

*Mackie Wolf Zientz & Mann, P.C.*, Dallas, Texas, 10/12-present

Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

*Higier Allen & Lautin, P.C.*, Addison, Texas, 1/09-10/12

Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

*Cowles & Thompson, P.C.*, Dallas, Texas, 9/99-1/09

I was an associate until I was made a Shareholder in December 2000. Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

*Fanning, Harper & Martinson, P.C.*, Dallas, Texas 9/98-9/99

I was an associate in the firm's governmental defense section. Practice areas: defense of governmental entities in civil rights and employment cases. My duties included sitting second chair at trial; drafting and answering discovery; drafting and arguing all varieties of motions; drafting appellate briefs; and attending mediations.

*Kuntz & Bonesio, L.L.P.*, Dallas, Texas 6/97-9/98

I was a litigation associate. Practice areas: commercial litigation, general insurance defense, employment law, and insurance subrogation. My duties included sitting second chair at trial; drafting and answering discovery; drafting and arguing all varieties of motions.

*Texas Court of Appeals, Tenth District*, Waco, Texas, 10/94-6/97

I was a briefing attorney for Judge Bob Cummings until July 1996 when I was hired as Judge Cummings' permanent staff attorney. I was the principal legal advisor to Judge Cummings; researched and drafted opinions in complex appeals; consulted with other judges on reconciling differences on the correct application of law; prepared drafts of opinions reconciling differences; led discussions of cases at court conferences; supervised interns and more junior legal staff; and handled the Court's motions docket.

*Texas Employment Commission*, Austin, Texas 1/94-10/94

I was a hearing officer, presiding over administrative hearings concerning unemployment compensation and issued written opinions.

### EDUCATION

**Juris Doctorate**, 5/93

*Catholic University of America*, Washington D.C.

Associate Moot Court member, 1/91-5/93

Finalist, Dean's Cup Moot Court Competition, 3/91

President and Secretary of Guild of Catholic Lawyers, 5/91-5/93

**B.A. in English Literature**, concentrating in Politics, 5/90  
*University of Dallas*, Irving, Texas

PROFESSIONAL  
ASSOCIATIONS

Admitted to Texas State Bar, Fifth Circuit, and all Texas Federal District Courts;  
Member of the Dallas Bar Association; Consumer Law and Civil Appellate Sections of  
the Texas Bar; Federal Bar Association; Immediate Past President, St. Thomas More  
Society; Pro Bono Counsel to White Rose Women's Center

# **EXHIBIT A-2**



Invoice Date

09/27/2019

Mackie Wolf Zientz & Mann, P.C.  
 14160 N. Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

## INVOICE

Selene Finance  
 P. O. Box 422039  
 Houston, TX 77242-4239

Loan No: [REDACTED]  
 Reference:  
 Property Addr: 1017 BURLESON STREET  
 SAN MARCOS, TX 78666  
 Our File: 19-000021-409-2

Loan Type: HEL; Case Type: Litigation; Filing Date: ; Chapter: NO

## BILLING SUMMARY:

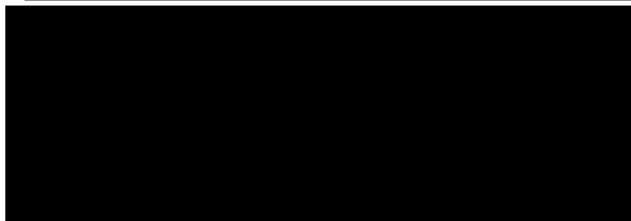
COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
09/17/2019	Title Order Cost- Recoverable	Yes	\$270.63

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
09/12/2019	Senior Attorney Fee-Hourly-Recoverable Danaher, Philip	Yes	\$215.00	1.50	\$322.50
Assess statute of limitations issues in response to client's inquiry.					
09/12/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Telephone conference with Marie Hawkins regarding issues and background					
09/12/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	3.80	\$817.00
Research legal issues					
09/12/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Telephone conference with opposing counsel regarding background and settlement negotiations					
09/13/2019	Senior Attorney Fee-Hourly-Recoverable Danaher, Philip	Yes	\$215.00	0.40	\$86.00
Further assess statute of limitations issues.					
09/13/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.60	\$129.00
Telephone conference with Kelly Harvey regarding background of suit and strategy					
09/13/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.30	\$64.50
Telephone conference with Marie Hawkins regarding liability and settlement analysis					
09/13/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange correspondence with opposing counsel and mediator confirming agreement to extend deadline to respond to mediator's proposal					
09/13/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Receipt and review case file from K. Harvey					
09/14/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	1.20	\$258.00

Research legal theories on transforming rule 736 proceedings to rule 735 proceedings					
09/16/2019	Senior Attorney Fee-Hourly-Recoverable Danaher, Philip	Yes	\$215.00	0.40	\$86.00
Research caselaw on lender's ability to rescind acceleration while foreclosure suit is pending and burden of party asserting statute of limitations defense.					
09/17/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence to title company requesting title search from 4/10/08 to current.					
09/17/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.50	\$42.50
Prepare notice of lis pendens					
09/17/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence to title company requesting the recording of the notice of lis pendens.					
09/17/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence serving notice of lis pendens on opposing counsel					
09/17/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.50	\$107.50
Review loan documents and applicable case law to determine strategy					
09/18/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Receipt and review title report from title company.					
09/19/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	2.90	\$246.50
Retrieve client loan documents from Serengeti, renaming same					
09/19/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Exchange correspondence with M. Hawkins regarding case analysis and decision to proceed with filing federal lawsuit					
09/19/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Telephone conference with K. Harvey regarding loan and litigation history					
09/19/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	2.20	\$473.00
Prepare draft of complaint to file in federal court					
09/20/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	1.50	\$322.50
Review prior correspondence and comments					
09/20/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Telephone conference with K. Harvey regarding loss mitigation history					
09/20/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange correspondence with opposing counsel regarding objection of mediator's proposal					
09/20/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Telephone conference with Goldman and Selene representatives regarding liability analysis, settlement strategy and litigation strategy					
09/23/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Review court docket					
09/23/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence to client requesting a payoff quote good through October 23, 2019					
09/23/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.40	\$34.00
Prepare notice of appearance and designation of lead counsel					

09/23/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	2.50	\$537.50
Continued preparation of original complaint					
09/23/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Prepare correspondence to M. Hawkins attaching draft of complaint					
09/23/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Prepare certificate of interested persons/corporate disclosure statement					
09/24/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Finalize notice of appearance and designation of lead counsel					
09/24/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.30	\$25.50
Prepare reinstatement quote letter good through October 31, 2019					
09/24/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.30	\$25.50
Prepare payoff quote letter good through October 31, 2019					

TOTALS	
DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$270.63
Total Hourly Fees Since Last Billing	\$4,427.50
Current Amount Due	\$4,698.13
Payments Received	\$0.00
<b>Total Amount Due</b>	<b>\$4,698.13</b>



Invoice Date

10/10/2019

Mackie Wolf Zientz & Mann, P.C.  
 14160 N. Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

## INVOICE

Selene Finance  
 P. O. Box 422039  
 Houston, TX 77242-4239

Loan No: [REDACTED]  
 Reference:  
 Property Addr: 1017 BURLESON STREET  
 SAN MARCOS, TX 78666  
 Our File: 19-000021-409-2

Loan Type: HEL; Case Type: Litigation; Filing Date: ; Chapter: NO

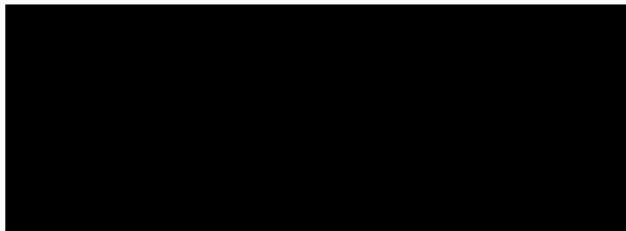
## BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
10/07/2019	File Stamped Copy - copies of missing pleadings-Non-Recoverable	No	\$162.98

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
09/16/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	2.50	\$537.50
Research prior case, loan file and analysis of tolling theories that will allow to file new suit for foreclosure.					
09/25/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Electronic correspondence with M. Hawkins regarding draft of complaint.					
09/25/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange electronic correspondence with M. Hawkins regarding edits to complaint.					
09/30/2019	Paralegal Fee-Hourly-Recoverable Escobedo, Rosalie	Yes	\$85.00	0.10	\$8.50
Attorney review step worked for the purpose of moving the case forward.					
10/02/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	2.20	\$473.00
Review new corporate structure to finalize complaint; emails with M. Hawkins regarding the same.					
10/04/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.30	\$25.50
Prepare correspondence to court clerk requesting cost for obtaining missing pleadings from court file.					
10/04/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchanged electronic correspondence with M. Hawkins regarding corporate structure of investor.					
10/07/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.70	\$59.50
Receipt and review pleadings filed in court case and processing same from court clerk					

TOTALS	
DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$162.98
Total Hourly Fees Since Last Billing	\$1,276.00

Current Amount Due	\$1,438.98
Previous Balance	\$4,698.13
Payments Received	\$0.00
<b>Total Amount Due</b>	<b>\$6,137.11</b>



Invoice Date

10/24/2019

Mackie Wolf Zientz & Mann, P.C.  
 14160 N. Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

## INVOICE

Selene Finance  
 P. O. Box 422039  
 Houston, TX 77242-4239

Loan No: [REDACTED]  
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Loan Type: HEL; Case Type: Litigation; Filing Date: ; Chapter: NO

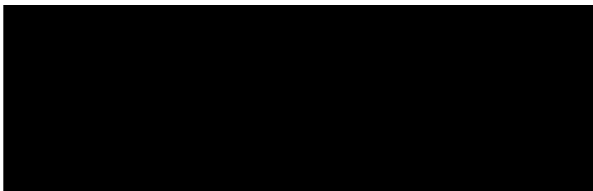
## BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
10/11/2019	Court Costs for filing complaint.- Recoverable	Yes	\$400.00

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
10/08/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.90	\$193.50
Revise complaint to properly identify citizenship of MTGLQ, edit the document per Marie Hawkins; and include abandonment of acceleration theory due to home equity cure offer; email revised draft to Ms. Hawkins					
10/11/2019	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$85.00	0.20	\$17.00
Research and obtain military status of named defendants					
10/11/2019	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$85.00	0.20	\$17.00
Research and obtain bankruptcy status of named defendants prior to filing					
10/11/2019	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$85.00	0.30	\$25.50
Finalize and prepare for filing, Plaintiff's Complaint, Certificate of Interested Parties and Civil Coversheet					
10/11/2019	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$85.00	0.30	\$25.50
Prepare summons requests for named defendants					
10/24/2019	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$85.00	0.30	\$25.50
Correspondence exchange with process server confirming Jerry K. Walden and Tamatha Walden were both served 10/21/19					

TOTALS	
DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$400.00
Total Hourly Fees Since Last Billing	\$304.00

Current Amount Due	\$704.00
Previous Balance	\$6,137.11
Payments Received	\$4,698.13
<b>Total Amount Due</b>	<b>\$2,142.98</b>



Invoice Date

11/21/2019

Mackie Wolf Zientz & Mann, P.C.  
 14160 N. Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

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 Our File: 19-000021-409-2

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## BILLING SUMMARY:

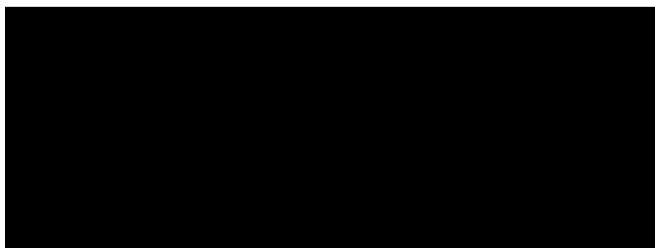
COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
09/17/2019	Recording Costs - NOTICE OF LIS PENDENS- Recoverable	Yes	\$38.00
10/21/2019	Process Server Costs - served Tamatha Walden- Recoverable	Yes	\$148.50
10/21/2019	Process Server Costs - served Jerry Walden, Jr.- Recoverable	Yes	\$88.50

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
10/11/2019	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Telephone conference with M. Hawkins regarding edits to complaint.					
10/11/2019	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Make revisions to complaint.					
10/11/2019	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Draft and prepare civil cover sheet.					
10/11/2019	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Finalize complaint for filing.					
10/16/2019	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$85.00	0.30	\$25.50
Correspondence to process server to request service on two named defendants					
10/18/2019	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$85.00	0.20	\$17.00
Receive filed copy of Notice of Lis Pendens					
10/23/2019	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$120.00	0.20	\$24.00
Correspondence to process server to request status of service on defendants					



10/28/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review status of service of complaint.					
11/05/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review trial payment plan info from K. Harvey.					
11/07/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence to process server requesting returns of summons on Jerry and Tamatha Walden					
11/07/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Receipt and review executed returns of service on Jerry and Tamatha Walden from process server.					
11/07/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review court's docket for upcoming deadlines.					
11/07/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review filed returns of service.					
11/12/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review motion to dismiss.					

TOTALS	
DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$275.00
Total Hourly Fees Since Last Billing	\$616.50
Current Amount Due	\$891.50
Previous Balance	\$6,841.11
Payments Received	\$6,137.11
<b>Total Amount Due</b>	<b>\$1,595.50</b>



Invoice Date

12/06/2019

Mackie Wolf Zientz & Mann, P.C.  
 14160 N. Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

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HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
11/19/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange electronic correspondence with M. Hawkins regarding status of case and providing copy of motion to dismiss.					
11/22/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Review case status					
11/25/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	1.80	\$387.00
Research case law on federal court jurisdiction over judicial foreclosure suits to prepare response to motion to dismiss or abstain.					
11/25/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	1.20	\$258.00
Research case law on Colorado River abstention to prepare response to motion to dismiss or abstain.					
11/26/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence to client requesting payoff quote good through December 26, 2019 for use as an exhibit to the motion for summary judgment					
11/26/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	1.20	\$258.00
Prepare appendix in support of response to motion to dismiss or abstain.					
11/26/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	2.70	\$580.50
Continued preparation of brief in response to motion to dismiss or abstain.					
12/02/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	2.90	\$623.50
Initial preparation of the Motion for Summary Judgment					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$2,184.00
Current Amount Due	\$2,184.00
Previous Balance	\$7,732.61
Payments Received	\$6,137.11
<b>Total Amount Due</b>	<b>\$3,779.50</b>

Invoice Date

01/24/2020

Mackie Wolf Zientz & Mann, P.C.  
 14160 N. Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

## INVOICE

Selene Finance  
 P. O. Box 422039  
 Houston, TX 77242-4239

Loan No. [REDACTED]  
 Reference:  
 Property Addr: 1017 BURLESON STREET  
 SAN MARCOS, TX 78666  
 Our File: 19-000021-409-2

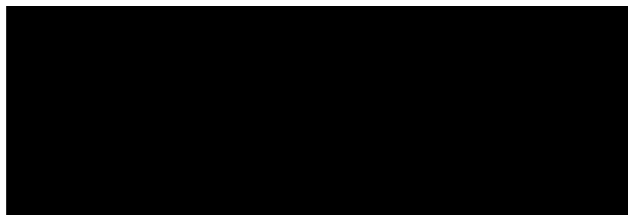
MWZM Case No.: 19-000021-409-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

## BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
11/26/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.30	\$25.50
Finalize exhibits to appendix in support of response to motion to dismiss or abstain					
11/26/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.30	\$64.50
Prepare draft order denying motion to dismiss or abstain.					
11/26/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Prepare email draft of response to M. Hawkins.					
11/26/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.60	\$129.00
Search case law for brief in support of MSJ regarding abandonment of acceleration while a rule 736 case remains pending.					
12/03/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Exchange electronic correspondence with opposing counsel regarding agreement to his request for extension of time to file reply in support of motion to dismiss.					
12/03/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review opposing counsel's motion to extend time.					
12/09/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Review status of court's ruling on defendants' motion to dismiss					
12/10/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Receipt and review payoff quote without fees good through December 26, 2019					
12/16/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence to Connie Hawkins requesting the loan comments/call history or correspondence with borrower between 1/17/12 to 7/18/12.					
12/16/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	2.80	\$602.00
Continued preparation of the Motion for Summary Judgment					

12/17/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	0.80	\$172.00
Continued preparation of the Motion for Summary Judgment					
12/18/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence to Connie Hawkins requesting a payoff quote and payment history					
12/18/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.30	\$25.50
Receipt and review payment histories and comment log from client					
12/19/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Receipt and review payoff quote good through January 15, 2020 from client					
12/19/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	0.50	\$107.50
Prepared the proposed Summary Judgment Order					
12/19/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	1.20	\$258.00
Prepared the client affidavit in support of the Motion for Summary Judgment					
12/20/2019	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.60	\$51.00
Review file and begin preparation of exhibits in support of declaration to motion for summary judgment					
12/23/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Review and revise motion for summary judgment prepared by L. Stansberry.					
12/26/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	0.50	\$107.50
Prepared the Appendix in support of the Motion for Summary Judgment					
12/27/2019	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Review and revise MSJ prepared by L. Stansberry.					
01/02/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence to M. Hawkins providing the declaration and exhibits in support of the motion for summary judgment for review, execution and return for filing					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$1,902.50
Current Amount Due	\$1,902.50
Previous Balance	\$9,916.61
Payments Received	\$7,732.61
<b>Total Amount Due</b>	<b>\$4,086.50</b>



Invoice Date

02/21/2020

Mackie Wolf Zientz & Mann, P.C.  
 14160 N. Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

## INVOICE

Selene Finance  
 P. O. Box 422039  
 Houston, TX 77242-4239

Loan No. [REDACTED]  
 Reference:  
 Property Addr: 1017 BURLESON STREET  
 SAN MARCOS, TX 78666  
 Our File: 19-000021-409-2

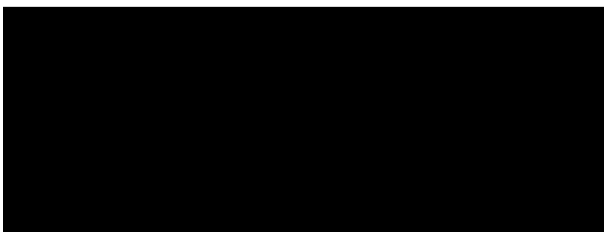
MWZM Case No.: 19-000021-409-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

## BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
12/19/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	2.40	\$516.00
Reviewed additional documentation from the client and finalized the draft of the Motion for Summary Judgment					
12/26/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	0.60	\$129.00
Critical research and analysis regarding the offer to re-close the loan sufficient to cure Constitutional defects even if not accepted by the borrower					
12/26/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	0.60	\$129.00
Prepared additional briefing in the Motion for Summary Judgment and client Declaration in support					
12/27/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	0.90	\$193.50
Prepared an additional ground of contractual estoppel in the Motion for Summary Judgment					
12/27/2019	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	0.70	\$150.50
Compiled the remaining exhibits for the Motion for Summary Judgment					
01/02/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	1.50	\$127.50
Complete file review and preparation of exhibits in support of declaration to motion for summary judgment, redacting same.					
01/07/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.30	\$25.50
Review status of whether the court has made a ruling on defendants motion to dismiss and status of the executed declaration by the client in support of the motion for summary judgment					
01/16/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.30	\$25.50
Excess correspondence with client regarding status of execution of declaration in support of the motion for summary judgment					
01/16/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review status of summary judgment affidavit.					
01/29/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Receipt and review executed client declaration					

01/29/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.30	\$25.50
Prepare revisions to appendix in support of motion for summary judgment					
01/29/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.60	\$51.00
Finalize exhibits in support of motion for summary judgment, bates labeling same per requirements for appendix					
01/29/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.40	\$17.00
Conduct military searches on Tamataha Walden and Jerry Walden prior to filing motion for summary judgment					
01/29/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.40	\$17.00
Conduct bankruptcy searches on Tamataha Walden and Jerry Walden prior to filing motion for summary judgment					
01/29/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review signed summary judgment affidavit.					
01/30/2020	Senior Attorney Fee-Hourly-Recoverable Stansberry, Lindsay	Yes	\$215.00	1.00	\$215.00
Prepared citations to the Appendix and finalized the Motion for Summary Judgment in preparation for filing					
01/30/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.30	\$25.50
Exchange correspondence with client to determine if the loan is currently being considered for loss mitigation prior to filing the motion for summary judgment					
01/30/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review and revise motion for summary judgment prepared by L. Stansberry.					
02/04/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Review status of response to our motion for summary judgment filed on January 30, 2020					
02/12/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange electronic correspondence with opposing counsel regarding not opposing his request for more time to file summary judgment response.					
02/14/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review motion to extend time for summary judgment response.					
02/14/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review order granting opposing counsel's request for extension of time to respond to our motion for summary judgment.					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$1,896.50
Current Amount Due	\$1,896.50
Previous Balance	\$11,819.11
Payments Received	\$7,732.61
<b>Total Amount Due</b>	<b>\$5,983.00</b>



Invoice Date

05/22/2020

Mackie Wolf Zientz & Mann, P.C.  
 14160 Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

## INVOICE

Selene Finance  
 P. O. Box 422039  
 Houston, TX 77242-4239

Loan No: [REDACTED]  
 Reference:  
 Property Addr: 1017 BURLESON STREET  
 SAN MARCOS, TX 78666  
 Our File: 19-000021-409-2

MWZM Case No.: 19-000021-409-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

## BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
04/20/2020	Filing Costs- Recoverable	Yes	\$38.00

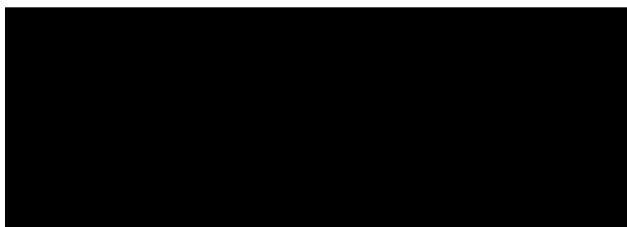
HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
02/26/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Review court docket to determine if court has ruled on the motion to extend time to respond to the motion for summary judgment although request is for an extension until February 28, 2020					
02/28/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange electronic correspondence with opposing counsel regarding his request for a 2nd extension of time to respond to our motion for summary judgment.					
02/28/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review opposing counsel's 2nd motion to extend time to respond to our motion for summary judgment.					
03/02/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review order granting 2nd request for more time to respond to our msj.					
03/04/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Review status of borrower's deadline to respond to the motion for summary judgment					
03/06/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review defendant's answer .					
03/06/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review response to motion for summary judgment.					
03/08/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review court docket for timeliness of borrower's summary-judgment response.					
03/09/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review order referring motion for summary judgment to magistrate judge.					

03/09/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Exchange electronic correspondence opposing counsel regarding his request for a conference on his motion for leave to file his summary judgment response out of time.					
03/12/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Provide case update to M. Hawkins.					
03/13/2020	Paralegal Fee-Hourly-Recoverable Jackson, Erin	Yes	\$85.00	0.80	\$68.00
Prepared draft Unopposed Motion to Extend Time to Respond to Defendant's Response to Motion for summary Judgment and proposed Order					
03/13/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review order granting opposing counsel's motion for leave to file summary judgment response out of time.					
03/13/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Telephone conference with opposing counsel regarding certificate of conference on motion to extend time to file summary judgment reply.					
03/13/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review and revise motion to extend time to file summary judgment reply prepared by E. Jackson.					
03/14/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Advise M. Hawkins of case status.					
03/20/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	3.50	\$752.50
Prepare reply in support of motion for summary judgment.					
03/24/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange correspondence with M. Hawkins regarding filing of reply brief and status of case					
03/27/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review emergency order regarding COVID 19.					
04/02/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review order granting our motion to extend time for our summary-judgment reply and deeming same timely filed.					
04/20/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.30	\$25.50
Prepare notice of lis pendens to be filed for the federal court lawsuit					
04/20/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Review and revise notice of lis pendens for federal suit prepared by S. Taplin.					
04/20/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence to title company requesting the notice of lis pendens be recorded					
04/22/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence serving the notice of lis pendens being filed in Hays County, Texas regarding the federal suit.					
05/01/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.50	\$107.50
Prepare draft scheduling order.					
05/01/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email correspondence with opposing counsel regarding draft of scheduling order.					
05/04/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00



Receipt and review recorded notice of lis pendens from title company					
05/05/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Follow up email to opposing counsel regarding his edits to proposed scheduling order.					
05/05/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Telephone conference with Kelly Harvey regarding case status.					

TOTALS	
DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$38.00
Total Hourly Fees Since Last Billing	\$1,748.00
Current Amount Due	\$1,786.00
Previous Balance	\$13,715.61
Payments Received	\$13,715.61
<b>Total Amount Due</b>	<b>\$1,786.00</b>



Invoice Date

07/27/2020

Mackie Wolf Zientz & Mann, P.C.  
 14160 Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

## INVOICE

Selene Finance  
 P. O. Box 422039  
 Houston, TX 77242-4239

Loan No: [REDACTED]  
 Reference:  
 Property Addr: 1017 BURLESON STREET  
 SAN MARCOS, TX 78666  
 Our File: 19-000021-409-2

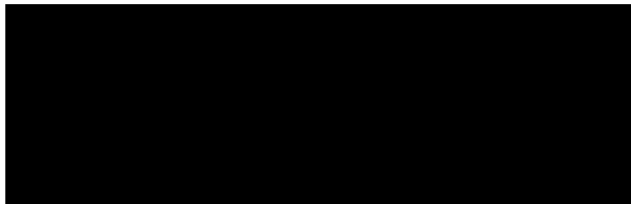
MWZM Case No.: 19-000021-409-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

## BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
05/31/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Prepare email correspondence with opposing counsel regarding status of his review of proposed agreed scheduling order.					
06/01/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Telephone conference with opposing counsel regarding dates for proposed agreed scheduling order.					
06/01/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Revisions to draft of proposed agreed scheduling order.					
06/01/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Prepare email communication to M. Hawkins regarding what demand we should make per scheduling order.					
06/02/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review signed scheduling order.					
06/04/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review case status.					
06/09/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review order setting scheduling conference.					
06/12/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email communication with M. Hawkins regarding status of settlement authority.					
06/15/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.40	\$34.00
Prepare non-consent for US Magistrate Judge for trial in the matter					
06/15/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review notice of non-consent to magistrate judge filed by opposing counsel.					
06/17/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email communication with Marie Hawkins regarding settlement authority.					

06/17/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Prepare email communication to opposing counsel submitting settlement demand.					
06/23/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Call in to initial conference (court re-sets because it was not aware I was on a different line).					
06/23/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review emergency Covid order from the court.					
07/01/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.50	\$107.50
Prepare Initial Disclosures and Notice.					
07/01/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.50	\$107.50
Review and determine documents to be produced as part of the Initial Disclosures.					
07/02/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review amended scheduling order.					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$872.50
Current Amount Due	\$872.50
Previous Balance	\$15,501.61
Payments Received	\$15,501.61
<b>Total Amount Due</b>	<b>\$872.50</b>



Invoice Date

08/07/2020

Mackie Wolf Zientz & Mann, P.C.  
 14160 Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

## INVOICE

Selene Finance  
 P. O. Box 422039  
 Houston, TX 77242-4239

Loan No. [REDACTED]  
 Reference: [REDACTED]  
 Property Addr: 1017 BURLESON STREET  
 SAN MARCOS, TX 78666  
 Our File: 19-000021-409-2

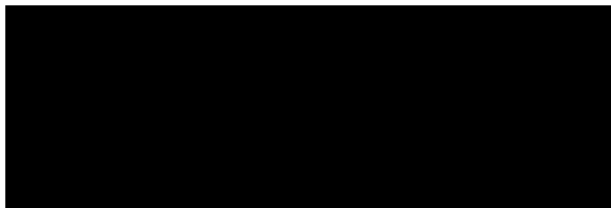
MWZM Case No.: 19-000021-409-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

## BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
07/02/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review counter offer from opposing counsel.					
07/06/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review court's docket.					
07/06/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email correspondence with M. Hawkins regarding settlement negotiations.					
07/08/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Finalize initial disclosures					
07/08/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Prepare correspondence serving opposing counsel with initial disclosures					
07/08/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review and revise initial disclosures prepared by V.L.					
07/08/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Prepare settlement analysis for M. Hawkins.					
07/13/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.30	\$64.50
Review docket sheet in order to prepare written discovery requests.					
07/14/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	1.00	\$215.00
Prepare First Set of Interrogatories for Defendants.					
07/14/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	1.00	\$215.00
Prepare First set of Request for Admissions to Defendants.					
07/14/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	1.00	\$215.00
Prepare First Set of Request of Production of Documents to Defendant.					

07/14/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review and revise written discovery requests prepared by VL.					
07/15/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.50	\$107.50
Prepare Joint Report for Alternative Dispute Remedies.					
07/15/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review and revise ADR report prepared by VL.					
07/15/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email communication with opposing counsel regarding draft of ADR report.					
07/16/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email communication with Marie Hawkins regarding settlement authority.					
07/20/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Telephone conference with opposing counsel regarding draft of ADR report.					
07/21/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review opposing counsel's initial disclosures.					
07/22/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review opposing counsel's initial disclosures.					
07/23/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Receipt and review borrower's initial disclosures					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$1,405.50
Current Amount Due	\$1,405.50
Previous Balance	\$16,374.11
Payments Received	\$15,501.61
<b>Total Amount Due</b>	<b>\$2,278.00</b>



Invoice Date

09/29/2020

Mackie Wolf Zientz & Mann, P.C.  
 14160 Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

## INVOICE

Selene Finance  
 P. O. Box 422039  
 Houston, TX 77242-4239

Loan No. [REDACTED]  
 Reference:  
 Property Addr: 1017 BURLESON STREET  
 SAN MARCOS, TX 78666  
 Our File: 19-000021-409-2

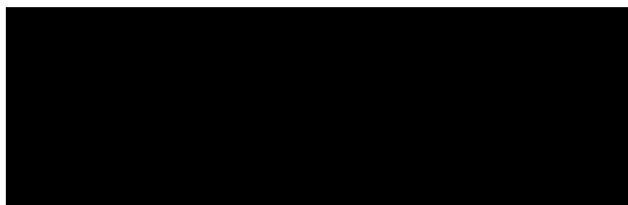
MWZM Case No.: 19-000021-409-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

## BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
08/14/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review magistrate's recommendation that our motion for summary judgment be granted.					
08/19/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email communication with M. Hawkins regarding magistrate's recommendation that our motion for summary judgment be granted and next steps.					
08/21/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email communication with opposing counsel regarding his request for more time to object to the magistrate's recommendation on our motion for summary judgment.					
08/27/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review motion to extend time to object to magistrate's recommendation from opposing counsel.					
08/28/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review order extending time for opposing counsel to file an objection to the magistrate's recommendation.					
08/31/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email communication with M. Hawkins regarding next steps.					
09/11/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Exchange email with opposing counsel agreeing to 2nd extension of time for him to file objection to magistrate judge's recommendation.					
09/11/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review motion to extend time by opposing counsel.					
09/14/2020	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$85.00	0.20	\$17.00
Receipt and review notices of service on 5 Arch Funding Corp and 5 Arch Income Fund 2, LLC from the Texas Secretary of State					
09/15/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Receipt and review with opposing counsel's objection to magistrate's recommendation on our MSJ.					

09/21/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	1.00	\$215.00
Begin preparation of response to borrowers` objection to magistrate`s recommendation on our motion for summary judgment and borrowers` motion to dismiss.					
09/22/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	3.80	\$817.00
Prepare response to defendants` objection to magistrate`s recommendation that our motion for summary judgment be granted and defendants` motion to dismiss be denied.					
09/22/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Prepare draft order overruling objection.					
09/23/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email with M. Hawkins regarding borrower`s filing their objection to the magistrate`s recommendation and our reply.					
09/25/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review order granting 2nd extension of borrowers` deadline to object to magistrate`s recommendation to grant our msj.					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$1,543.50
Current Amount Due	\$1,543.50
Previous Balance	\$17,779.61
Payments Received	\$17,779.61
<b>Total Amount Due</b>	<b>\$1,543.50</b>



Invoice Date

10/16/2020

Mackie Wolf Zientz & Mann, P.C.  
 14160 Dallas Pkwy Ste. 900  
 Dallas, TX 75254  
 Phone: (214) 635-2650  
 Fax: (214) 635-2686

## INVOICE

Selene Finance  
 P. O. Box 422039  
 Houston, TX 77242-4239

Loan No: [REDACTED]  
 Reference:  
 Property Addr: 1017 BURLESON STREET  
 SAN MARCOS, TX 78666  
 Our File: 19-000021-409-2

MWZM Case No.: 19-000021-409-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

## BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
09/28/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review court's docket.					
09/28/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email with opposing counsel regarding agreement to extend time for his reply in support of objection to magistrate judge's recommendation to grant our MSJ.					
09/29/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Exchange email with M. Hawkins regarding limitations issues in the case.					
09/29/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.10	\$21.50
Receipt and review opposing counsel's motion to extend time to file reply.					
09/30/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Receipt and review order extending time for borrowers to file reply in support of magistrate's recommendation on our motion for summary judgment.					
10/04/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review court's docket.					
10/15/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.80	\$172.00
Draft Motion for Award of Attorney's Fees.					
10/15/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.40	\$86.00
Draft Declaration in support of Motion for Award of Attorney's Fees.					
10/15/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.40	\$86.00
Draft proposed order for Motion Award of Attorney's Fees.					
10/15/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.30	\$64.50
Identify and retrieve exhibits to Motion for Award of Attorney's Fees.					
10/16/2020	Paralegal Fee-Hourly-Recoverable Lenehan, Rebecca	Yes	\$85.00	0.30	\$25.50



Combined supporting exhibits to the Motion for Award of Attorney's Fees.

**TOTALS**

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$670.50
Current Amount Due	\$670.50
Payments Received	\$17,779.61
<b>Total Amount Due</b>	<b>\$-17,109.11</b>



Invoice #: [REDACTED]

Invoice Date: 10/16/2020

Loan No: [REDACTED]

Reference:

Property Addr: 1017 BURLESON STREET

SAN MARCOS, TX 78666

Our File: 19-000021-409

BILLED CASE SUMMARY SINCE INCEPTION	
FEES	\$0.00
EXPENSES	\$1,146.61
TIME	\$18,847.00
TOTAL	\$19,993.61

Thank you for the opportunity to be of service.

Please contact [invoicing@mwzmlaw.com](mailto:invoicing@mwzmlaw.com) for any questions or concerns regarding items on this invoice.